

EXHIBIT 6



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Transcript of Todd A. Webb

Date: March 21, 2024

Case: Karnas, et al. -v- Cuban, et al.

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IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

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DOMINIK KARNAS, et al., :
Plaintiffs, : Case No.
v. : 1:22-cv-22538-ALTMAN/REID
MARK CUBAN, et al., :
Defendants. :
-----x

Videotaped Deposition of
TODD A. WEBB
Conducted Virtually
Thursday, March 21, 2024
2:31 p.m. EST

Job No.: 530569

Pages: 1 - 127

Reported by: Nancy C. Bendish, CCR, RMR, CRR

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1	kind, plus the interest that we were promised.	14:55:23
2	Q. And you've received some monies	14:55:30
3	back, correct?	14:55:36
4	A. Correct.	14:55:37
5	Q. And how much have you received	14:55:38
6	back from the estate?	14:55:39
7	A. Somewhere in the order of 30	14:55:43
8	percent of what the value of the holdings were	14:55:45
9	at that time.	14:55:50
10	Q. I saw something like \$6,700 or	14:55:52
11	around that? Do you know exactly how much you	14:55:55
12	received back?	14:56:00
13	A. That sounds about right. It's	14:56:01
14	hard for me to pin down exactly like a value,	14:56:08
15	because some of the money I put directly in as	14:56:11
16	US dollars and bought on the Voyager platform,	14:56:14
17	and some was crypto that I transferred over,	14:56:18
18	which each had its own cost basis.	14:56:20
19	Q. Right. However, whatever buttons	14:56:24
20	they pushed in the bankruptcy to get you a	14:56:30
21	number back, I believe I saw it was around	14:56:33
22	\$6700, but we can dig into that in a little bit.	14:56:39
23	But is that about the right number that you	14:56:43
24	recall?	14:56:46
25	A. It's around the right number,	14:56:48

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1	yeah.	14:56:50
2	Q. Okay. So, I'd like to spend a bit	14:56:51
3	of time unpacking some of your statements.	14:57:09
4	So, let's take the statements that	14:57:12
5	you made and just kind of focus on those first.	14:57:18
6	One of the statements that you	14:57:23
7	made were that all the accounts were earn	14:57:25
8	accounts. Is one of the claims as against Mark	14:57:31
9	if people signed up, all the accounts were earn	14:57:38
10	accounts; does that mean that the members of the	14:57:43
11	class are members that had Earn Program	14:57:46
12	accounts?	14:57:51
13	MR. BUSHMAN: Object to form.	14:57:52
14	Q. What do you mean by the statement,	14:57:53
15	all accounts were earn accounts?	14:57:55
16	A. Well, I believe that all of the	14:58:00
17	accounts at Voyager were eligible for earn. So,	14:58:01
18	if you had an account at Voyager, then you could	14:58:07
19	participate in earning interest or in kind, on	14:58:11
20	any of the cryptos that were supported there.	14:58:19
21	Q. And indeed, indeed that is, I	14:58:24
22	believe, accurate. However, you must agree that	14:58:31
23	the account was self-directed, correct? You	14:58:36
24	made your own investment decisions?	14:58:42
25	A. Yes.	14:58:45

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1	Q.	And that applies to anybody who	14:58:46
2		had an account at Voyager, correct?	14:58:48
3	A.	I can't speak to that for other	14:58:51
4		class members.	14:58:55
5	Q.	Well, it's in the documents, it's	14:58:56
6		in the agreement that you signed when you signed	14:58:59
7		up for Voyager, and you acknowledged that the	14:59:01
8		account was self-directed. So everybody signed	14:59:06
9		the same documents, right? The process of	14:59:08
10		applying for an account is uniform for everyone,	14:59:11
11		right?	14:59:16
12	A.	I suppose, if I understand the	14:59:18
13		question correctly. If you're asking whether	14:59:22
14		every single person that had an account did it	14:59:24
15		on their own and didn't have an investment	14:59:27
16		manager, I don't know that.	14:59:29
17	Q.	It's an application, correct?	14:59:36
18		It's an app on your phone, right?	14:59:41
19	A.	That's how I interfaced with	14:59:44
20		Voyager, yes.	14:59:46
21	Q.	Is there any other way to	14:59:46
22		interface with Voyager than on a phone?	14:59:48
23	A.	There's a company there and they	14:59:54
24		have a website. You can contact them directly	14:59:55
25		if you like.	14:59:58

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1	Q.	Yeah, but the account and the use	14:59:59
2		of the account is through an application, not	15:00:05
3		through a website; right?	15:00:08
4	A.	I believe so. I don't know if you	15:00:13
5		could buy and sell anything by contacting them	15:00:15
6		directly.	15:00:19
7	Q.	Okay.	15:00:22
8	A.	I assume most everything was	15:00:23
9		through the application.	15:00:24
10	Q.	Give me one second because I	15:00:37
11		didn't think we would have an issue about this.	15:00:41
12		Let me find it.	15:00:43
13		MR. BEST: Can we pull up Exhibit	15:00:55
14		8, please. Mark that Defendant's 1. And then	15:01:00
15		if you can make it just a little bigger, please.	15:01:32
16		(Exhibit Webb 1 was marked and	15:01:37
17		introduced at this time.)	15:01:39
18	Q.	I represent to you this is	15:01:39
19		Voyager's customer agreement as updated on	15:01:41
20		August 20th, 2021; that in the process of	15:01:43
21		signing on for an account you had to check --	15:01:50
22		well, let me just end it, what I represent this	15:01:55
23		to be.	15:01:59
24		Do you remember signing up for	15:02:00
25		your account?	15:02:02

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1	A.	Yes.	15:02:02
2	Q.	And in the process of signing up	15:02:03
3		for your account, you had to check a box that	15:02:04
4		you read and agreed to the customer agreement	15:02:06
5		before they let you open an account, correct?	15:02:11
6	A.	Correct.	15:02:14
7	Q.	If I can turn your attention to	15:02:15
8		the fifth page of this document, which is	15:02:24
9		paragraph 6, Voyager Services.	15:02:28
10	A.	Okay.	15:02:32
11	Q.	Do you see the first sentence in	15:02:32
12		paragraph number 6, Voyager Services?	15:02:38
13	A.	I do.	15:02:41
14	Q.	And what does it say?	15:02:42
15	A.	It says: "The account is	15:02:44
16		self-directed."	15:02:47
17	Q.	And what do you understand that to	15:02:49
18		mean?	15:02:50
19	A.	That means that you choose what	15:02:51
20		you're going to be investing in within that	15:02:54
21		account.	15:02:57
22	Q.	And again, do you have any reason	15:03:00
23		to believe that this isn't uniform for everybody	15:03:02
24		who signs up on a Voyager platform to start an	15:03:07
25		account?	15:03:13

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1	A.	They may have changed their terms	15:03:14
2		at some point, but otherwise I would think that	15:03:16
3		this is uniform, yes.	15:03:20
4	Q.	And if I can turn to section E,	15:03:25
5		which is about the ninth page of this document.	15:03:29
6		It's after number 10. Okay. If we can go to	15:03:51
7		section E, please.	15:04:03
8		And do you see section E?	15:04:07
9	A.	I do.	15:04:09
10	Q.	Do you see it's in bold as opposed	15:04:09
11		to the rest of the typeface, which was not in	15:04:12
12		bold?	15:04:15
13	A.	Okay.	15:04:16
14		MR. BEST: Can you scroll up,	15:04:19
15		please, so that Mr. Webb can see.	15:04:20
16	Q.	Do you see how section D is not in	15:04:24
17		bold, for the most part?	15:04:27
18	A.	Yes.	15:04:29
19	Q.	Can you read to me, please, the	15:04:31
20		title of section E.	15:04:35
21	A.	"Rewards Program Risks."	15:04:36
22	Q.	Okay. And what's the first risk	15:04:40
23		that's identified; can you read that into the	15:04:42
24		record?	15:04:45
25	A.	Sure. "By virtue of entering into	15:04:46

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1	a commercial arrangement such as this customer	15:04:49
2	agreement, customer is exposed to potential	15:04:51
3	Voyager credit risk. By participating in the	15:04:54
4	Rewards Program customer's cryptocurrency may be	15:04:57
5	at increased risk of loss."	15:05:01
6	Q. And when you signed up for the	15:05:05
7	account you agreed, you acknowledged and	15:05:07
8	understood this risk and accepted it?	15:05:10
9	A. I wouldn't agree that I fully	15:05:15
10	understood the risks that Voyager had, in	15:05:18
11	hindsight, but yes, I understood that there was	15:05:24
12	risk.	15:05:28
13	Q. Some of the risks in hindsight,	15:05:28
14	for instance the three (indiscernible) actually	15:05:33
15	hadn't happened at the time you invested,	15:05:36
16	though, correct?	15:05:38
17	A. I don't know that.	15:05:41
18	Q. Let's look at paragraph 2, "Loans	15:05:46
19	may not be secured." Can you read number 2 into	15:05:49
20	the record, please.	15:05:51
21	A. Sure. "Loans may not be secured.	15:05:52
22	Cryptocurrency subject to a loan will not be	15:05:55
23	held by Voyager or the custodians. Customer	15:05:58
24	understands and acknowledges that Voyager is not	15:06:01
25	responsible for any cryptocurrency that Voyager	15:06:04

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1	BY MR. BEST:	15:38:02
2	Q. I want to keep focusing on what	15:38:03
3	your view of the class you represent is,	15:38:07
4	Mr. Webb.	15:38:10
5	In continuing to explore the	15:38:14
6	definition of the class, does the class of	15:38:16
7	investors -- and when I use the term	15:38:23
8	"investors," it's those people who opened	15:38:27
9	accounts at Voyager -- does the class have to	15:38:29
10	have any touchpoints to Mark Cuban and the Mavs	15:38:34
11	like you do, with the Mavs code?	15:38:38
12	MR. BUSHMAN: Object to the form.	15:38:41
13	A. I think that is kind of central.	15:38:50
14	Q. And your touchpoint -- without	15:39:06
15	talking to you, one could identify your	15:39:06
16	touchpoint to the Mavs and Mark Cuban as using	15:39:10
17	the MAVS100 code in signing up for a crypto	15:39:15
18	account and using that code; is that a fair	15:39:22
19	statement?	15:39:26
20	A. What exactly do you mean by a	15:39:27
21	touchpoint?	15:39:29
22	Q. If somebody wanted to -- that	15:39:30
23	doesn't interview you -- wanted to see that you	15:39:33
24	may have been exposed to the Mavericks	15:39:36
25	promotional and sponsorship agreement, and	15:39:46

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1	relied in some way, shape or form on Mark Cuban	15:39:55
2	to open their Voyager account without talking to	15:40:00
3	that person, one way to do it would be to look	15:40:05
4	to see if you used the Mav's promotional code,	15:40:08
5	correct?	15:40:18
6	A. Yes. Although I think it might	15:40:19
7	include people outside that because that	15:40:20
8	promotional code I think was only good for three	15:40:22
9	days. So there may be people that were also	15:40:25
10	influenced but weren't able to join in that	15:40:30
11	three-day period.	15:40:33
12	Q. And I want to talk about those, in	15:40:34
13	a bit.	15:40:36
14	How do you identify those people	15:40:39
15	in the class from just simply looking at the	15:40:41
16	documents?	15:40:45
17	MR. BUSHMAN: Object to the form.	15:40:46
18	Q. Without talking to them, how do	15:40:49
19	you identify those people who may have been	15:40:50
20	influenced by Mark Cuban and the Mavs, but	15:40:59
21	didn't sign up for the promotional code?	15:41:03
22	MR. BUSHMAN: Object to the form.	15:41:05
23	A. That's a good question. If you're	15:41:10
24	looking for how do you prove that, I mean, these	15:41:12
25	are people that say that that's why they joined	15:41:18

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1	then.	15:41:23
2	Q. But I'd have to interview each one	15:41:24
3	of them, correct?	15:41:26
4	MR. BUSHMAN: Object to the form.	15:41:27
5	A. If they didn't use the MAVS100	15:41:32
6	code?	15:41:35
7	Q. Correct.	15:41:36
8	A. I suppose.	15:41:37
9	Q. Okay. Let me kind of walk through	15:41:38
10	as I see three groupings of people that had	15:41:46
11	Voyager accounts, okay? And just bear with me	15:41:51
12	for 15 seconds, 20 seconds. It's always more.	15:41:55
13	The first group are those Voyager	15:42:00
14	acountholders who signed up for a Voyager	15:42:05
15	account before Mark Cuban and the Dallas	15:42:12
16	Mavericks announced their sponsorship agreement,	15:42:19
17	October 27th, 2021, okay?	15:42:22
18	A. Okay.	15:42:26
19	MR. BUSHMAN: I object to the form	15:42:26
20	of that question. Go ahead.	15:42:27
21	Q. Do you acknowledge that there are	15:42:32
22	a group of people that opened their account	15:42:33
23	before, and traded and invested, before October	15:42:38
24	27th, 2021?	15:42:45
25	A. I assume so. I don't know that.	15:42:48

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1	Q.	Well, you know that Voyager was an	15:42:52
2		active crypto account wallet and had an exchange	15:42:55
3		before you actually opened your account on	15:43:03
4		October 29th, right?	15:43:06
5	A.	I would assume so.	15:43:08
6	Q.	And do you represent a class of	15:43:12
7		people that opened their accounts before October	15:43:16
8		27th, 2021 and traded before the Mavs'	15:43:22
9		sponsorship announcement?	15:43:28
10		MR. BUSHMAN: Object to form.	15:43:30
11	A.	I would say possibly. Sorry.	15:43:32
12		I'd say possibly, if they stayed	15:43:34
13		at Voyager because of -- if they thought the	15:43:37
14		platform was more legitimate because it was	15:43:41
15		backed by the Mavs and Mark Cuban, then I don't	15:43:44
16		know that it should be limited to just people	15:43:48
17		that used the MAV100 code, but anybody that was	15:43:50
18		still there, with their full face in Voyager	15:43:55
19		when it collapsed.	15:43:57
20	Q.	And we talked about this just a	15:44:02
21		few minutes ago, which was there's no readily	15:44:05
22		identifiable way to determine whether or not	15:44:11
23		those people stayed because of Mark Cuban	15:44:16
24		without interviewing or talking to them	15:44:22
25		individually, correct?	15:44:26

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1	MR. BUSHMAN: Object to the form.	15:44:27
2	Q. How would you determine that they	15:44:30
3	stayed in the platform or effected any trades	15:44:33
4	because of Mark Cuban from simply looking at	15:44:41
5	their trading history?	15:44:47
6	MR. BUSHMAN: Object to the form.	15:44:48
7	A. I don't know.	15:44:50
8	Q. How would you -- if I asked you to	15:44:55
9	figure out a way that -- whether or not these	15:44:58
10	people were influenced by Mark Cuban, what would	15:45:04
11	you think that your options are?	15:45:07
12	MR. BUSHMAN: Object to the form.	15:45:09
13	A. Ask them.	15:45:14
14	Q. Individually.	15:45:15
15	MR. BUSHMAN: Object to the form.	15:45:16
16	Q. Correct?	15:45:18
17	A. I don't know about individually.	15:45:21
18	You could easily -- we live in an age of	15:45:23
19	technology. We have -- Voyager has their	15:45:25
20	database. You just send a message to all of	15:45:30
21	them.	15:45:33
22	Q. But you're sending it to each of	15:45:33
23	them individually, is the point?	15:45:36
24	A. Yes.	15:45:39
25	Q. And then there's a group of	15:45:44

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1	investors that signed up on or after October	15:45:46
2	27th, 2021 that used the Mav's promotional code,	15:45:50
3	just like you, right?	15:45:59
4	A. Okay.	15:46:01
5	Q. Well, would you agree that you're	15:46:03
6	not the only one who used the MAVS100 code?	15:46:05
7	A. I'm pretty sure there's a lot of	15:46:11
8	people that used that code.	15:46:13
9	Q. And those investors are in a like	15:46:19
10	situation to you from the standpoint that they	15:46:22
11	opened their account on or after October 27th	15:46:27
12	and used the MAVS100 code to open their account,	15:46:32
13	correct?	15:46:36
14	A. Okay.	15:46:38
15	Q. Okay. And you represent that	15:46:40
16	class of people, correct?	15:46:43
17	A. Yes.	15:46:45
18	Q. Now, let's talk about the third	15:46:48
19	category, which is investors that opened their	15:46:51
20	account after October 27th, but didn't use the	15:46:59
21	MAVS code. Do you represent those people?	15:47:07
22	A. If they were still in place,	15:47:12
23	they're invested in the Voyager token, and they	15:47:15
24	lost their investment when Voyager collapsed,	15:47:18
25	then I would say yes.	15:47:21

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1	Q.	In that answer you didn't have any	15:47:24
2		touchpoints to Mr. Cuban or the Mavs.	15:47:28
3		MR. BUSHMAN: Object to the form.	15:47:33
4	Q.	Do you say that it's not required	15:47:35
5		under that class of people, to have a touchpoint	15:47:37
6		to Mr. Cuban and the Mavs?	15:47:40
7		MR. BUSHMAN: Object to the form.	15:47:43
8	A.	I'm not saying that.	15:47:45
9	Q.	Okay. So, do they have to have --	15:47:50
10		do the investors who opened their account after	15:47:55
11		October 27th, 2021, but did not use the MAVS	15:47:58
12		code, still have to have a touchpoint to	15:48:05
13		Mr. Cuban and the Mavs to be part of the class	15:48:07
14		you represent?	15:48:11
15		MR. BUSHMAN: Object to the form.	15:48:13
16	A.	Am I really expected to know in	15:48:20
17		such painstaking detail? Isn't that a question	15:48:23
18		for the legal team?	15:48:28
19	Q.	You're the lead plaintiff in the	15:48:31
20		class. I'm just asking --	15:48:35
21		MR. BUSHMAN: Steve, allow him to	15:48:35
22		finish his answer and then you can ask him the	15:48:37
23		next question.	15:48:39
24		Todd, were you finished with your	15:48:41
25		answer?	15:48:44

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1	THE WITNESS: Yeah.	15:48:46
2	Q. Do you understand that there may	15:48:48
3	be a group of people who opened their account at	15:48:50
4	Voyager after October 27th, but before the	15:48:53
5	bankruptcy in June or July of 2022, that didn't	15:48:59
6	use the MAVS100 code, correct?	15:49:06
7	A. Yes.	15:49:12
8	Q. And those people, if they didn't	15:49:12
9	redeem, lost money as well, correct?	15:49:14
10	A. Correct.	15:49:17
11	Q. And I'm just trying to determine,	15:49:17
12	that class of people, do you believe there has	15:49:25
13	to be any -- the claim is, you're bringing a	15:49:28
14	claim against the Mavericks and Mark Cuban,	15:49:33
15	right?	15:49:38
16	MR. BUSHMAN: Object to the form.	15:49:39
17	A. Yes.	15:49:40
18	Q. And so necessary to the claim	15:49:40
19	against Mark Cuban and the Dallas Mavericks is	15:49:42
20	that they did something wrong, correct?	15:49:47
21	MR. BUSHMAN: Object to the form.	15:49:52
22	A. Yes.	15:49:58
23	Q. You're lead plaintiff in a case	15:50:00
24	where there have been allegations of conduct by	15:50:02
25	the Dallas Mavericks and Mark Cuban, right?	15:50:08

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1	A.	Yes.	15:50:12
2	Q.	And so, now going back to this	15:50:15
3		class of people that opened their account after	15:50:18
4		October 27th but didn't use the MAVS code, the	15:50:21
5		question is do you represent, as the lead	15:50:27
6		plaintiff in this case, those investors who	15:50:30
7		opened their account after October 27th but	15:50:32
8		didn't use the MAVS code, and have no way of	15:50:39
9		showing on its face that they relied in any way,	15:50:44
10		shape or form on Mark Cuban or the Mavs?	15:50:48
11		MR. BUSHMAN: Object to the form.	15:50:54
12	A.	All I can say is anybody that	15:51:00
13		invested in the platform where Mark Cuban was a	15:51:02
14		partner and the Mavs were promoting, and that	15:51:10
15		was such a huge deal. I mean, this guy is a	15:51:15
16		billionaire, he's followed by so many people.	15:51:18
17		It's hard for me to believe that somebody could	15:51:21
18		be invested in Voyager and not the right time	15:51:26
19		and not use the code and not be involved in earn	15:51:28
20		and not buy VGX and not have anything to do with	15:51:31
21		the Mavs or Mark Cuban.	15:51:35
22	Q.	Well, Mr. Webb, you're a pretty	15:51:40
23		knowledgeable guy in crypto. You know that	15:51:43
24		there are other sponsors and celebrity endorsers	15:51:46
25		of Voyager, correct?	15:51:52

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1	MR. BUSHMAN: Object to the form.	15:51:53
2	A. I'm not aware of who those are,	15:51:55
3	no.	15:51:58
4	Q. All right. Look, are you aware	15:51:58
5	that there's something called referral codes?	15:52:00
6	Do you know what a referral code is?	15:52:06
7	A. A referral code, yes.	15:52:09
8	Q. What is a referral code, as you	15:52:10
9	understand it in the crypto world?	15:52:13
10	A. That might be something that the	15:52:16
11	platform will reward their existing platform	15:52:23
12	customers by recruiting other people to the	15:52:25
13	platform by using a code, or may be even people	15:52:28
14	that aren't on the platform, they could have an	15:52:37
15	agreement to give them some incentives. Or --	15:52:41
16	Q. Would it surprise you that -- I'm	15:52:46
17	sorry. Were you finished?	15:52:49
18	A. Not exactly, but...	15:52:52
19	Q. No, please, finish the thought.	15:52:54
20	A. It's more of a way to track where	15:53:00
21	their new customers are coming from, what	15:53:05
22	promotions they're putting out there, which ones	15:53:08
23	are working and which ones aren't, right? Am I	15:53:10
24	understanding?	15:53:15
25	Q. 100 percent agree. And in doing	15:53:17

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1	that, it's evidence that they were not	15:53:19
2	influenced by Mr. Cuban or the Mavs for signing	15:53:24
3	up; they were influenced by something else.	15:53:29
4	Would you agree with that?	15:53:32
5	MR. BUSHMAN: Object to the form.	15:53:33
6	A. Not entirely. Because if somebody	15:53:34
7	followed Mark Cuban and wanted to be on the	15:53:37
8	platform, they missed the MAVS100 code, they may	15:53:40
9	have been searching for other codes.	15:53:45
10	Q. But you can't determine that, as	15:53:46
11	we've discussed, on the face of the documents.	15:53:48
12	You would have to speak to that investor or	15:53:51
13	accountholder individually, correct?	15:53:56
14	MR. BUSHMAN: Object to the form.	15:53:58
15	A. Yes.	15:54:04
16	Q. Would it surprise you -- you know	15:54:05
17	what, let's get into it right now.	15:54:09
18	MR. BEST: Can I have, go to tab	15:54:20
19	32, please.	15:54:25
20	THE TECHNICIAN: Just to confirm,	15:54:43
21	counsel, this is the technician, was that --	15:54:44
22	MR. BEST: That's the new binder,	15:54:47
23	that's the Twitter feed starting with Rob	15:54:52
24	Gronkowski's Twitter feed on October 15, 2021.	15:54:57
25	THE TECHNICIAN: And what was the	15:55:02

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1	tab number?	15:55:02
2	MR. BEST: I have 32. I'm sorry.	15:55:03
3	Garrison 32.	15:55:11
4	THE TECHNICIAN: Sorry about that.	15:55:12
5	That's what I was --	15:55:14
6	MR. BEST: I apologize. I'm the	15:55:14
7	slow guy in the room. Everybody else is having	15:55:22
8	to keep me going here.	15:55:25
9	(Exhibit Webb 3 was marked and	15:55:25
10	introduced at this time.)	15:55:25
11	Okay, if you can enlarge that.	15:55:40
12	Q. I'm showing you what's marked as	15:55:42
13	Defendant's, and I apologize, is it 3 or 2?	15:55:44
14	MR. BUSHMAN: 3.	15:55:53
15	Q. Which is, I represent, a fair and	15:55:53
16	accurate screenshot of a Twitter feed from	15:55:56
17	October 15th, 2021. And at the top do you see	15:56:02
18	"Rob Gronkowski reposted"? Do you see that?	15:56:08
19	A. Yes.	15:56:12
20	Q. Do you know who Rob Gronkowski is?	15:56:12
21	A. I believe he's an ex-football	15:56:16
22	player.	15:56:20
23	Q. And do you know that he was a	15:56:20
24	Voyager -- he had a sponsorship agreement with	15:56:27
25	Voyager and promoted Voyager on a routine basis?	15:56:32

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1	Did you know that?	15:56:39
2	A. I became aware of that later, but	15:56:41
3	not...	15:56:44
4	Q. Okay. So --	15:56:48
5	MR. BUSHMAN: I'm sorry, were you	15:56:49
6	finished? You said "but not"?	15:56:50
7	A. But not that he was repeatedly. I	15:56:58
8	forgot what you said in the end there.	15:57:02
9	Q. And do you see him reposting a	15:57:06
10	Voyager tweet saying that Bitcoin's at an	15:57:11
11	all-time high?	15:57:16
12	A. Okay.	15:57:17
13	Q. And do you see underneath it it	15:57:19
14	says loading and at 99 percent? What do you	15:57:25
15	understand a reposting to do?	15:57:28
16	MR. BUSHMAN: Object to the form.	15:57:33
17	A. I'm a little confused again at	15:57:35
18	what I'm looking at. So this is a --	15:57:37
19	Q. It's a Twitter feed from Voyager	15:57:40
20	about -- as of October 15, 2021, stating that	15:57:43
21	Bitcoin's at an all-time high and it's loading.	15:57:49
22	A. So this is Rob --	15:57:54
23	Q. Rob --	15:57:56
24	A. -- Rob Gronkowski's account and	15:57:59
25	he's reposting something that Voyager posted on	15:58:01